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Attorneys for Defendants GOLDEN NUGGET,  
LLC; LANDRY'S, LLC; LAS VEGAS SANDS  
CORP.; and MGM RESORTS INTERNATIONAL

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LINKSMART WIRELESS TECHNOLOGY,  
LLC,

Plaintiff,

v.

CAESARS ENTERTAINMENT  
CORPORATION,

Defendant.

Case No. 2:18-cv-00862-MMD-NJK

LINKSMART WIRELESS TECHNOLOGY,  
LLC,

Plaintiff,

v.

Case No. 2:18-cv-00864-MMD-NJK

GOLDEN NUGGET, INC. and LANDRY'S,  
INC.,  
Defendants.

LINKSMART WIRELESS TECHNOLOGY,  
LLC,  
Plaintiff,

v.

LAS VEGAS SANDS CORP.,  
Defendant.

Case No. 2:18-cv-00865-MMD-NJK

LINKSMART WIRELESS TECHNOLOGY,  
LLC,  
Plaintiff,

v.

MGM RESORTS INTERNATIONAL,  
Defendant.

Case No. 2:18-cv-00867-MMD-NJK

LINKSMART WIRELESS TECHNOLOGY,  
LLC,  
Plaintiff,

v.

WYNN LAS VEGAS LLC,  
Defendant.

Case No. 2:18-cv-00868-MMD-NJK

**MGM RESORTS INTERNATIONAL'S UNOPPOSED MOTION FOR LEAVE TO FILE  
FIRST AMENDED ANSWER. AFFIRMATIVE DEFENSES,  
AND COUNTERCLAIMS TO PLAINTIFF'S COMPLAINT**

Defendant MGM Resorts International seeks leave pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure to file an amended answer, attached as Exhibit A. Specifically, MGM's proposed amended answer adds an additional affirmative defense based on the theory of intervening rights. Linksmart has informed MGM that it does not oppose this motion.

1 Federal Rule of Civil Procedure 15(a)(2) provides that once the time has passed to amend a  
2 pleading as a matter of course, a party may amend its pleading “only with the opposing party’s  
3 written consent or with the court’s leave,” and “[t]he court should freely give leave when justice so  
4 requires.” FED. R. CIV. P. 15(a)(2). In this case, the Court has not yet set a deadline for amending  
5 pleadings in the Scheduling Order. (*See* ECF No. 71.) Accordingly, the liberal policy of Rule  
6 15(a)(2) applies to the instant unopposed motion.

7 Leave to amend a party’s pleading should be granted unless the opposing party can show  
8 prejudice, bad faith, undue delay or futility. *Foman v. Davis*, 371 U.S. 178, 182 (1962); *see also*  
9 *Abramson v. Gonzalez*, 949 F.2d 1567, 1581 (11th Cir. 1992). Because none of these conditions  
10 are present in this case, MGM respectfully requests that this Court grant it leave to amend its  
11 answer.

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Dated: February 21, 2020

Respectfully submitted,

By /s/ Aleem A. Dhalla

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LLC; LAS VEGAS SANDS CORP.; and  
MGM RESORTS INTERNATIONAL

**ORDER**

Defendant MGM's unopposed motion for leave to file is **GRANTED**. Docket No. 117.  
Defendant shall promptly file and serve its amended pleading.

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: February 24, 2020